

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov

In re:

MARY JEAN NAVITSKY

16-bk-06965-CCJ
Chapter 13

Debtor.

MOTION TO MODIFY MODIFIED ORDER CONFIRMING CHAPTER 13 PLAN
Related Document 30

**NOTICE OF OPPORTUNITY TO OBJECT
AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within twenty-one (21) days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at the George C. Young Federal Courthouse, 400 W. Washington Street, Suite 5100, Orlando, Florida 32801 and serve a copy on the movant's attorney, Paul L. Urich, Esquire, Law Office of Paul L. Urich, P.A., 1510 E. Colonial Drive, Suite 204, Orlando, Florida 32803 and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

COMES NOW the Debtor, MARY JEAN NAVITSKY, by and through his undersigned attorney, and files this Motion to Modify the Order Confirming Chapter 13 Plan, and, as grounds in support of this Motion, the following is stated:

1. The Order Confirming Modified Chapter 13 Plan was entered in the above-styled case on JULY 10, 2017 (Doc. No. 30).

2. This Motion is filed to assist the Debtor with her Plan payments so that they are more affordable to them.

3. By this Motion, the Debtors are proposing a modification to her current Chapter 13 payment plan.

4. Proposed disbursements to creditors are shown on the spreadsheet attached hereto and incorporated herein as Exhibit "A".

5. The undersigned attorney seeks fees and costs in the amount of three hundred fifty (\$350.00) dollars for the workup of modified payments and disbursements, for the preparation, filing, and service of this Motion, and for communications with the Chapter 13 Trustee's office concerning the same, which fees and costs shall be disbursed by the Chapter 13 Trustee.

8. The Debtors propose that all other terms and conditions of prior Orders of this Court shall remain the same and in full force and effect but for those specific changes to the Debtor's Plan payments and creditor disbursements, as referenced herein and on the attached spreadsheet.

WHEREFORE, the Debtor, MARY JEAN NAVITSKY, by and through his undersigned attorney, prays that the Court will:

- A. grant this Motion and enter an Order modifying the Debtor's Plan payments and creditor disbursements, as proposed herein;
- B. allow attorney's fees and costs for the preparation and service of this Motion in the amount of three hundred fifty (\$350.00) dollars Dollars which shall be disbursed by the Chapter 13 Trustee; and
- C. grant such other and further relief as the Court deems appropriate.

Date: September 20, 2017

Respectfully submitted,

LAW OFFICE OF PAUL L. URICH, P.A.

BY: /s/ Paul L. Urich, Esquire
Paul L. Urich, Esquire
1510 East Colonial Drive, Suite 204
Orlando, Florida 32803
Telephone: (407) 896-3077
Telecopy: (407) 896-3041
Florida Bar No.:0088780
Email: paulu@urichoffice.com
Attorney for the Debtor

I HEREBY CERTIFY that a true and correct copy of this document is being served by United States Regular Mail, postage prepaid, or by CM/ECF electronic transmission, as may be applicable, on all creditors and interested parties, as listed on the Court Matrix, on September 20 2017.

BY: /s/ Paul L. Urich, Esquire
Paul L. Urich, Esquire/Florida Bar No.:0088780

EXHIBIT "A"

Mary Jean Navitsky

Case No.: 6:16-bk-06965-CCJ

MOTION TO MODIFY

Filed: 10/24/2016

Payment Due Dates	Unsecured Creditors	Plan Payments	10.0% Trustee	Attorney Fees Ulrich	Claim 1 IRS 2014-2016	Claim 2 Nationstar Mortgage LLC	Claim 2 Nationstar Mortgage LLC
60	60			\$2,540.00		Ongoing	\$325.13
11/23/2016 1	\$0.20 1 at	\$28.00	\$2.80		1 at \$25.00	1 at	
12/23/2016 2	\$0.79	\$353.00	\$35.30			\$316.91	
1/23/2017 3	\$0.79	\$353.00	\$35.30			\$316.91	
2/23/2017 4	\$0.79	\$353.00	\$35.30			\$316.91	
3/23/2017 5	\$0.79	\$353.00	\$35.30			\$316.91	
4/23/2017 6	\$0.79	\$353.00	\$35.30			\$316.91	
5/23/2017 7	\$0.79 6 at	\$353.00	\$35.30	7 at	6 at	\$316.91	7 at
6/23/2017 8	\$0.09	\$1,251.00	\$125.10	\$50.00	\$62.38	\$316.91	\$15.00
7/23/2017 9	\$0.09 2 at	\$1,251.00	\$125.10	2 at \$50.00	2 at \$62.38	8 at \$316.91	2 at \$15.00
8/23/2017 10	\$0.00		\$0.00				
9/23/2017 11	\$0.00 2 at		\$0.00	2 at	2 at	2 at	2 at
10/23/2017 12	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
11/23/2017 13	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
12/23/2017 14	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
1/23/2018 15	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
2/23/2018 16	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
3/23/2018 17	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
4/23/2018 18	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
5/23/2018 19	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
6/23/2018 20	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
7/23/2018 21	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
8/23/2018 22	\$4.37	\$1,455.00	\$145.50	\$50.00	\$72.78	\$369.73	\$17.50
9/23/2018 23	\$4.37 12 at	\$1,455.00	\$145.50	12 at \$50.00	12 at \$72.78	12 at \$369.73	12 at \$17.50
10/23/2018 24	\$4.19	\$1,300.00	\$130.00	\$90.00	\$62.38	\$316.91	\$15.00
11/23/2018 25	\$4.19	\$1,300.00	\$130.00	\$90.00	\$62.38	\$316.91	\$15.00
12/23/2018 26	\$4.19	\$1,300.00	\$130.00	\$90.00	\$62.38	\$316.91	\$15.00
1/23/2019 27	\$4.19	\$1,300.00	\$130.00	\$90.00	\$62.38	\$316.91	\$15.00
2/23/2019 28	\$4.19	\$1,300.00	\$130.00	\$90.00	\$62.38	\$316.91	\$15.00
3/23/2019 29	\$9.06	\$1,300.00	\$130.00	6 at \$90.00	\$62.38	\$316.91	\$10.13
4/23/2019 30	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
5/23/2019 31	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
6/23/2019 32	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
7/23/2019 33	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
8/23/2019 34	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
9/23/2019 35	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
10/23/2019 36	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
11/23/2019 37	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
12/23/2019 38	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
1/23/2020 39	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
2/23/2020 40	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
3/23/2020 41	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
4/23/2020 42	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
5/23/2020 43	\$4.19	\$1,300.00	\$130.00	\$105.00	\$62.38	\$316.91	
6/23/2020 44	\$4.19	\$1,300.00	\$130.00	15 at \$105.00	\$62.38	\$316.91	
7/23/2020 45	\$34.19	\$1,300.00	\$130.00	1 at \$75.00	\$62.38	\$316.91	
8/23/2020 46	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
9/23/2020 47	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
10/23/2020 48	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
11/23/2020 49	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
12/23/2020 50	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
1/23/2021 51	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
2/23/2021 52	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
3/23/2021 53	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
4/23/2021 54	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
5/23/2021 55	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
6/23/2021 56	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
7/23/2021 57	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
8/23/2021 58	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	
9/23/2021 59	\$109.19	\$1,300.00	\$130.00		\$62.38	\$316.91	36 at
10/23/2021 60	\$109.53 37 at	\$1,300.00	\$130.00		37 at \$62.38	37 at \$316.91	1 at
\$1,822.80		\$70,208.00	\$7,020.80	\$2,890.00	\$3,331.18	\$18,697.71	\$325.13
\$61,901.77		PLAN	Trustee	Attorney	CLM 001	CLM 002	CLM 102
3%		BASE	Commissions	2540 plus	PD @ 4%		
				\$350 MTM			
				Fees			

Mary Jean Navitsi
Case No.: 6:16-bl
Filed: 10/24/2016

Payment Due Dates	Claim 2 Nationstar Mortgage LLC	Claim 3 Ally Bank	Claim 103 Ally Bank
60	\$966.91	Ongoing	Arrears
11/23/2016 1			
12/23/2016 2			
1/23/2017 3			
2/23/2017 4			
3/23/2017 5			
4/23/2017 6			
5/23/2017 7	7 at		
6/23/2017 8	18.25	554.82	\$15.60
7/23/2017 9	18.25	554.82	\$15.60
8/23/2017 10			
9/23/2017 11	2 at		
10/23/2017 12	21.3	647.29	\$18.20
11/23/2017 13	21.3	647.29	\$18.20
12/23/2017 14	21.3	647.29	\$18.20
1/23/2018 15	21.3	647.29	\$18.20
2/23/2018 16	21.3	647.29	\$18.20
3/23/2018 17	21.3	647.29	\$18.20
4/23/2018 18	21.3	647.29	\$18.20
5/23/2018 19	21.3	647.29	\$18.20
6/23/2018 20	21.3	647.29	\$18.20
7/23/2018 21	21.3	647.29	\$18.20
8/23/2018 22	21.3	647.29	\$18.20
9/23/2018 23	21.3	647.29	\$18.20
10/23/2018 24	18.25	554.82	\$15.60
11/23/2018 25	18.25	554.82	\$15.60
12/23/2018 26	18.25	554.82	\$15.60
1/23/2019 27	18.25	554.82	\$15.60
2/23/2019 28	18.25	554.82	\$15.60
3/23/2019 29	18.25	554.82	\$15.60
4/23/2019 30	18.25	554.82	\$15.60
5/23/2019 31	18.25	554.82	\$15.60
6/23/2019 32	18.25	554.82	\$15.60
7/23/2019 33	18.25	554.82	\$15.60
8/23/2019 34	18.25	554.82	\$15.60
9/23/2019 35	18.25	554.82	\$15.60
10/23/2019 36	18.25	554.82	\$15.60
11/23/2019 37	18.25	554.82	\$15.60
12/23/2019 38	18.25	554.82	\$15.60
1/23/2020 39	18.25	554.82	\$15.60
2/23/2020 40	18.25	554.82	\$15.60
3/23/2020 41	18.25	554.82	\$15.60
4/23/2020 42	18.25	554.82	\$15.60
5/23/2020 43	18.25	554.82	\$15.60
6/23/2020 44	18.25	554.82	\$15.60
7/23/2020 45	18.25	554.82	\$15.60
8/23/2020 46	18.25	554.82	\$15.60
9/23/2020 47	18.25	554.82	\$15.60
10/23/2020 48	18.25	554.82	\$15.60
11/23/2020 49	18.25	554.82	\$15.60
12/23/2020 50	18.25	554.82	\$15.60
1/23/2021 51	18.25	554.82	\$15.60
2/23/2021 52	18.25	554.82	\$15.60
3/23/2021 53	18.25	554.82	\$15.60
4/23/2021 54	18.25	554.82	\$15.60
5/23/2021 55	18.25	554.82	\$15.60
6/23/2021 56	18.25	554.82	\$15.60
7/23/2021 57	18.25	554.82	\$15.60
8/23/2021 58	18.25	554.82	\$15.60
9/23/2021 59	18.25	554.82	\$15.60
10/23/2021 60	17.91	554.82	\$15.60
	\$967.01	\$29,405.46	\$826.80
	CLM 202	CLM 003	CLM 103
	One extra	Ongoing	Arrears
	payment ("gap	Payments	
	payment")	2016 CHEVY	
	plus post-Petition	CRUZE	Paid with
	attorney fees		interest at the
	for the creditor		contract rate
	in the amount of		

Label Matrix for local noticing
113A-6
Case 6:16-bk-06965-CCJ
Middle District of Florida
Orlando
Wed Sep 20 12:57:03 EDT 2017

Synchrony Bank
c/o PRA Receivables Management, LLC.
PO Box 41021
Norfolk, VA 23541-1021

Ally Bank
PO Box 130424
Roseville MN 55113-0004

Capital One
Po Box 30285
Salt Lake City, UT 84130-0285

Destiny Springs Condo Assc
c/o All About Managment, Inc
206 S. Elm Ave
Sanford, FL 32771-1262

LVNV Funding, LLC its successors and assigns
assignee of FNEW, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Nationstar Mortgage LLC
8950 Cypress Waters Blvd
Coppell, TX 75019-4620

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Scott R Weiss +
Choice Legal Group, PA
PO Box 9908
Ft Lauderdale, FL 33310-0908

Marian G Kennady +
Van Ness Law Firm, PLC
1239 East Newport Center Drive
Suite 110
Deerfield Beach, FL 33442-7711

NATIONSTAR MORTGAGE LLC dba Mr. Cooper
C/O Choice Legal Group, P.A.
P. O. Box 9908
Ft. Lauderdale, FL 33310-0908

Aaron N Cmoni
7326 Edgewater Dr.
Orlando, FL 32810-3463

Ally Financial
Po Box 380901
Bloomington, MN 55438-0901

Credit One Bank Na
Po Box 98873
Las Vegas, NV 89193-8873

Florida Department of Revenue
Bankruptcy Unit
Post Office Box 6668
Tallahassee FL 32314-6668

Marie Navistsky
4085 Buglars Rest Place
Casselberry, FL 32707-4708

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Seminole County Tax Collector
Attn: Ray Valdes
Post Office Box 630
Sanford FL 32772-0630

Paul L Urlich +
Law Office of Paul L Urlich PA
1510 East Colonial Drive
Suite 204
Orlando, FL 32803-4734

Mary Jean Navitsky
954 B Lake Destiny Rd
Altamonte Springs, FL 32714-6963

Ally Auto/Bkcy Dept
PO Box 130424
Roseville, MN 55113-0004

Business Law Group
301 W Platt St. # 375
Tampa, FL 33606-2292

David D Lee, Esq
PMB # 129
5703 Red Bug Lake Rd
Winter Springs, FL 32708-4969

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

(p)NATIONSTAR MORTGAGE LLC
PO BOX 619096
DALLAS TX 75261-9096

Paul Nughes
4 Lauren Ct
Ormond Beach, FL 32174-3813

Laurie K Weatherford +
Post Office Box 3450
Winter Park, FL 32790-3450

United States Trustee - ORL7/13 7+
Office of the United States Trustee
George C Young Federal Building
400 West Washington Street, Suite 1100
Orlando, FL 32801-2210

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Nationstar Mortgage LLC
350 Highland Drive Drive
Lewisville, TX 75067

(d)Nationstar Mortgage LLC
PO Box 619096
Dallas, TX 75261

Portfolio Recovery
Po Box 41067
Norfolk, VA 23541

(d)Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Nationstar Mortgage LLC

(d)Internal Revenue Service
Post Office Box 7346
Philadelphia PA 19101-7346

End of Label Matrix	
Mailable recipients	27
Bypassed recipients	2
Total	29